

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN HILL, Individually and On Behalf of All)	Civil Action No. 1:10-cv-07838-PAC
Others Similarly Situated,)	
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
CHINA-BIOTICS, INC., JINAN SONG, LI CHI)	
YUEN a/k/a RAYMOND LI, LEWIS FAN, YAN)	
YIHONG a/k/a EVA YAN, TRAVIS CAI, CHIN JI)	
WEI, DU WEN MIN, SIMON YICK, ROTH)	
CAPITAL PARTNERS LLC, and MAXIM)	
GROUP LLC,)	
)	
Defendants.)	
)	

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF SETTLEMENT, CLASS CERTIFICATION,
APPROVAL OF PLAN OF ALLOCATION, AND AWARD OF ATTORNEYS' FEES
AND EXPENSES AND LEAD PLAINTIFF'S REPRESENTATIVE REIMBURSEMENT**

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 10, 2015 at 2:30 P.M., in the Courtroom of the Honorable Paul A. Crotty, Judge of the United States District Court, Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, Courtroom 14C, 500 Pearl Street, New York, NY 10007, Lead Plaintiffs John Hill and Nureddin Nejim, and additional Plaintiff Frank M. Tworek (collectively, "Plaintiffs"), will and hereby respectfully move the Court to enter a judgment and order (1) granting final approval of the Settlement of this litigation; (2) granting class certification for settlement purposes; (3) approving the Plan of Allocation of settlement proceeds and the sufficiency of Notice; and (4) awarding Lead Plaintiff's Counsel's attorneys' fees and expenses, and approving Plaintiffs' Representative Reimbursement. This motion is based upon the accompanying Memorandum of Law, the declarations filed in support thereof, the Stipulation of Settlement dated March 31, 2015, and the accompanying exhibits attached therewith, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider in the hearing of this motion.

Dated: August 20, 2015

LAW OFFICES OF CURTIS V. TRINKO, LLP

By: /s/ Curtis V. Trinko

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Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the August 20, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ Curtis V. Trinko
Curtis V. Trinko